

## Example Maintenance Plan for a Simple Site

This maintenance plan example may be considered as an example template to begin developing an actual plan at simple sites that have only certain features. Sites that are more complex or contain different features should not use this example. Additional guidance on the content of Operation and Maintenance Plans can be found in “Guidance for Cover Systems as Soil Performance Standard Remedies”, PUBL-RR-709.

This example template can be used to begin developing an actual maintenance plan at a simple site that:

- Is closed with contaminated soil remaining that contains contaminants exceeding NR 720 RCLs and the soil presents a direct contact and/or migration to groundwater pathway threat;
- Uses a soil performance standard cover or barrier to address the direct contact and/or migration to groundwater pathway(s); and
- Uses a cover or barrier that is pavement and/or a building(s).
- can be closed with natural attenuation addressing the groundwater pathway where contaminated soil remains that can leach contaminants into groundwater. Often a cover or barrier is a necessary part of the overall remedial approach to assure natural attenuation continues successfully after closure, because it provides some level of infiltration reduction that should not be changed. These maintenance plans should be developed to assure that occurs after closure is granted.

## PAVEMENT COVER AND BUILDING BARRIER MAINTENANCE PLAN

[ DATE]

Property Located at:

[ACTIVITY ADDRESS]

[FID # (if known), WDNR BRRTS/Activity #]

[LEGAL DESCRIPTION] [TAX #]

### Introduction

This document is the Maintenance Plan for a pavement cover and building barrier at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing [slab on grade] building and other paved surfaces occupying the area over the contaminated groundwater plume or soil on-site. The contaminated [groundwater plume] [or soil] is impacted by [enter list of contaminant(s)]. The location of the paved surfaces and building to be maintained in accordance with this Maintenance Plan, as well as the impacted [groundwater plume] [or soil] are identified in the attached map (Exhibit A).

### Cover and Building Barrier Purpose

The paved surfaces and the building foundation over the contaminated [groundwater plume] [or soil] serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. [These paved surfaces and building foundation also act as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code.] Based on the current and future use of the property, the barrier should function as intended unless disturbed.

### Annual Inspection

The paved surfaces and building foundation overlying the [contaminated groundwater plume] [or soil] and as depicted in Exhibit A will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause [additional infiltration into] [or exposure to] underlying soils. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed will be documented. A log of the inspections and any repairs will be maintained by the property owner and is included as Exhibit B, Cap

Inspection Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be sent to the Wisconsin Department of Natural Resources ("WDNR") at least annually after every inspection, unless otherwise directed in the case closure letter.

#### Maintenance Activities

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling operations or they can include larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment ("PPE"). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the paved surfaces and/or the building overlying the [contaminated groundwater plume] [or soil] are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the paved surfaces and/or the building, will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

#### Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

#### Contact Information [MONTH & YEAR]

Site Owner and Operator: [NAME]  
[ADDRESS]  
[PHONE #]

Consultant: [NAME]  
[ADDRESS]  
[PHONE #]

WDNR: [PROJECT MANAGER NAME]  
[ADDRESS]  
[PHONE #]

**Exhibit B**  
***Barrier INSPECTION LOG***

<b>Inspection Date</b>	<b>Inspector</b>	<b>Condition of Cap</b>	<b>Recommendations</b>	<b>Have Recommendations from previous inspection been implemented?</b>